

United States District Court  
District of Massachusetts

United States of America )  
Vs. ) Criminal No. 04-512352  
John Chu ) 04-cr-10156 WGY  
)

FILED  
CLERK OF COURT  
U.S. DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

Motion For No Further Continuances  
of Trial Delay

Now comes the defendant and hereby moves pursuant to the Criminal Justice Act and pursuant to 18 § 3161 (2) that his trial be held on June 13, 2005. Defendant has Justs Notify the Government that he plans to use a defense of Entrapment. This should not pro-long the trial Date.

On June 2, 2005 Defendant's Counsel advise the defendant he needed more time to pursue this type of Defense. Defendant has told his Counsel one month ago that he was going to pursue this Defense. Counsel ha already delayed trial once before the Government and My counsel has had ample enough time to prepare for trial

- Argument -

Under 18 § 3161(2), the trial shall commence within Seventh days from the date of the action. See US vs Barnes 159 F 3d 4, Mass (1998)

Defendant Claims any more trial Continuances would Violated his Speedy Trial Act under the 5th. 6th. Amendment Const.

Defendant has already been incarcerated for more than 12 months, He has not file any motions and has no excludable time off his speedy Trial Clock.

Further - more the defendant plans To File a motion to Dismiss Due To Violation of his Speedy trial Right

Respectfully Submitted

Date: JUNE - 3 - 05



John Chu  
26 Long Pond Road  
Plymouth, Ma 02360

## Certificate of Service

This is to certify that I have This day  
of JUNE-3, 2005 Served the following  
individuals in the foregoing matter with  
one copy of the Foregoing

1. Motion For No Further Continuances  
of trial delay

By having delivered Via 1st class mail  
To the Following.

1. office of the Clerk

United States District Court  
One Courthouse Way  
Boston, Ma 02210

2. Charles P. McGinty

Federal Defender's Office  
408 Atlantic Ave, Third floor  
Boston, Ma 02110

3. Gregory T. Moffatt

United States Attorney office  
One Courthouse Way Suite 9200  
Boston, Ma. 02210

Date: JUNE-3-05

John Chu  
John Chu